

FILED

FEB 27 2008

**MICHAEL T. MASON
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 06 CR 515
v.)	Honorable Michael T. Mason
)	United States Magistrate Judge
ESMAIL GHAREKHANI, and)	
NOSRATOLLAH TAJIK,)	
a/k/a "Nasret Allah Tajek,")	

MOTION TO UNSEAL COMPLAINT

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, hereby moves to unseal the complaint and arrest warrants in this matter.

1. On August 30, 2006, this Court approved a complaint charging ESMAIL GHAREKHANI and NOSRATOLLAH TAJIK with: (1) conspiracy to export from the United States to Iran prohibited defense articles, specifically night vision and thermal imaging equipment, in violation of the Arms Export Control Act in violation of 22 U.S.C. § 2778 and 22 C.F.R. § 127.1; and (2) attempting to export from the United States these articles, also in violation of 22 U.S.C. § 2778 and 22 C.F.R. § 127.1. The Court also issued arrest warrants for these defendants at the time it authorized the complaint, but placed those warrants and the complaint under seal until further order of the Court.

2. On October 26, 2006, British law enforcement authorities arrested defendant TAJIK based upon an extradition package signed by this Court. The government now

respectfully moves to unseal the complaint and arrest warrants in this matter.

Respectfully submitted,

PATRICK J. FITZGERALD

United States Attorney

By:

A handwritten signature in cursive script, appearing to read "Daniel J. Collins", written over a horizontal line.

DANIEL J. COLLINS

Assistant United States Attorney

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DATE: February 27, 2008